

## REMARKS

In paragraph 23 of the Office Action, claims 1-4 were rejected under 35 U.S.C.103(a) as being unpatentable over Gorden or Llewellyn et al. in view of either Scott or Kosofsky et al.

Reconsider action is requested in view of this Amendment.

Claim 1 has been amended to improve the syntax and to point out that the collection tank is mounted on wheels and is adapted to be used when mounted on top of the trolley (14) on support (13). This amendment is supported by original claim 5 and the disclosure of booth of the drawings, which clearly show the wheels on collection tank (14).

The Gorden and Llewellyn et al. patents are concerned with single tank washing or degreasing apparatus that are not adapted for both use on a floor or in an elevated position depending on what type of parts are to be washed. The Gorden auto parts cleaner is designed for floor use and cannot be conveniently used in a standing position. The Llewellyn et al apparatus is also limited to the same type of use. In addition both of these apparatuses are not adapted for remote use because they use a single pump. The apparatus of amended claim 1 has an inlet pump and a return pump in order to efficiently transfer the washing fluid between the two vessels. Nothing in Gorden or Llewellyn et al. suggests this arrangement.

The secondary references do not make obvious the use of a second pump and none of the cited references suggest the concept of a washing apparatus that may be used on the floor or in an elevated position.

The Scott apparatus uses a single pump that is driven by an air propelled turbine that is mounted on the same axle. Kosofsky uses a second pump for maintaining an ozonized liquid in a tank by pumping the liquid through an ozone generator in a closed loop. This patent does not

describe the concept of having a transfer pump and a return pump in a washing apparatus that is adapted for floor use, which may involve the cleaning of the brake assembly of a vehicle or may be used as a parts washer in an elevated position.

The Magliocca patent does not suggest any teaching alone or in combination with the other references of record that makes the washing apparatus defined by the amended claim obvious. The Magliocca device is not adapted for floor use and for use in an elevated position because it is limited to use in an elevated position. This is evident from the description of the Magliocca patent which only teaches that when the covered top is removed, it becomes a case for the base member. There are no wheels on the top member of the Magliocca apparatus which are pointed out as elements of the applicant's device in amended claim 1. For these reasons, it is requested that this ground of rejection be withdrawn.

An early and favorable action is earnestly solicited.

Respectfully Submitted



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